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Attorneys for Lux Vending, LLC d/b/a Bitcoin Depot

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

CASH CLOUD, INC., dba COIN CLOUD,

Debtor.

Case No. 23-10423-MKN
Chapter 11

CASH CLOUD, INC., dba COIN
CLOUD,

Plaintiff,

Adv. No. 23-01015-MKN

v.

LUX VENDING, LLC d/b/a BITCOIN
DEPOT,

Defendant.

**OMNIBUS DECLARATION OF
SCOTT BUCHANAN IN SUPPORT OF
DEFENDANT LUX VENDING, LLC
D/B/A BITCOIN DEPOT'S OPPOSITION
TO PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

I, Scott Buchanan, do hereby voluntarily state under penalty of perjury as follows:

1. I am over 18 years of age, I have personal knowledge of the matters stated herein and I am competent to testify to these matters.

2. I am the Chief Operating Officer for Lux Vending, LLC d/b/a Bitcoin Depot ("Bitcoin Depot") and have been since March 2022.

3. I make this omnibus declaration in support of Bitcoin Depot's opposition to Plaintiff's Motion/or Temporary Restraining Order and Bitcoin Depot's opposition to Plaintiff's Motion/or Preliminary Injunction.

4. As Chief Operating Officer for Bitcoin Depot, I am responsible for the financial aspects of our business, including strategic finance, mergers and acquisitions, capital acquisition, financial planning and analysis, accounting, and long-term modeling. I also oversee Bitcoin Depot's human resources and legal departments.

5. Bitcoin Depot is the owner and operator of bitcoin teller machines located throughout the United States and Canada, providing its users with a convenient means of converting cash into cryptocurrency.

6. Contrary to Cash Cloud's representations, since February 7, 2023, Bitcoin Depot has not converted a single Cash Cloud host to switch from Cash Cloud to Bitcoin Depot.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 12th day of April 2023.


SCOTT BUCHANAN

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holley Driggs and that, on the 12th day of April 2023, I caused to be served a true and correct copy of OMNIBUS DECLARATION OF SCOTT BUCHANAN IN SUPPORT OF DEFENDANT LUX VENDING, LLC D/B/A BITCOIN DEPOT'S OPPOSITION TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION in the following manner:

☒ (ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) By serving a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those listed on the attached service list, and on the date above written.

/s/ Olivia Swibies
An employee of Holley Driggs